

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

Dominique B. Lovejoy,	)	
	)	
Plaintiff,	)	
	)	Case No. 3:23-cv-05393-MGL
v.	)	
	)	
Jason L. Richardson, Rocket Expediting, LLC,	)	
Super Ego Holdings, LLC, Super Ego	)	<b>26(f) JOINT DISCOVERY PLAN</b>
Logistics, LLC, Stefan Perovic, and Sendmee	)	
Trucking, LLC,	)	
	)	
Defendants.	)	
_____	)	

A. What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made;

**ANSWER:** The parties have elected not to exchange Rule 26(a)(1) initial disclosures.

B. The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues;

**ANSWER:** The parties believe the deadline for completing discovery as set forth in the initial scheduling order should be extended to August 9, 2024, as set forth in the proposed Amended Scheduling Order submitted by the parties.

C. Any issues about disclosure, discovery, or preservation of electronically stored information including the form or forms in which it should be produced;

**ANSWER:** None at this time. The parties consent to the electronic service of discovery.

D. Any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502;

**ANSWER:** None at this time. Should issues regarding privilege or confidentiality arise in the course of discovery, the parties will confer regarding a stipulated protective order to govern the use and disclosure of trade secret and other confidential research, development, and commercial information.

E. What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed; and

**ANSWER:** None.

F. Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).

**ANSWER:** The parties know of none at this time.

The parties will file separate responses to the information required by Local Civil Rule 26.03.

s/Bennett E. Casto

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